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November 23, 2005

Honorable Ray Edelman
Attorney At Law
150 South Main Street
Lawrenceburg, KY 40342

RE: Case No. 2005-00221

Please see enclosed data request from Commission Staff in the above case.

If you need further assistance, please contact Jessamyn Thompson at (502) 564-3940 ext. 278.

Sincerely,

A handwritten signature in black ink, appearing to read "Beth O'Donnell".

Beth O'Donnell
Executive Director

BOD/jc
Enclosure

Honorable Ray Edelman
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Bob Kincer
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South Anderson Water District
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COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE TARIFF FILING OF SOUTH ANDERSON WATER)	
DISTRICT SETTING POLICY FOR WATER MAIN)	CASE NO.
EXTENSIONS TO SERVE REAL ESTATE)	2005-00221
DEVELOPMENTS)	

COMMISSION STAFFS INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO SOUTH ANDERSON WATER DISTRICT

Pursuant to Administrative Regulation 807 KAR 5:001, Commission Staff requests that South Anderson Water District ("South Anderson District") file the original and 8 copies of the following information with the Commission within 20 days of this request, with a copy to all parties of record. Each copy of the information requested shall be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention shall be given to copied material to ensure its legibility. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be provided for total company operations and jurisdictional operations, separately.

1. List for each of the last 10 calendar years the number of real estate subdivision developments that connected to South Anderson District's water distribution system during that year.

2. List for each of the last 10 calendar years the number of real estate development subdivision tracts that connected to South Anderson District's water distribution system.

3. State for each of the last 10 calendar years the total value of water distribution assets that real estate subdivision developers donated or contributed to South Anderson District in conjunction with the extension of water service to the real estate subdivision.

4. State for each of the last 10 calendar years the total amount of refunds that South Anderson District has made annually to real estate subdivision developers for persons connecting to water main extensions in their subdivisions.

5. List each request for rate adjustment that South Anderson District has made to the Commission in the last 10 years. For each request, state the amount of the requested adjustment and describe the role that refunds to real estate subdivision developers played in South Anderson District's request.

6. List for each of the last 10 calendar years the amount of funds that South Anderson District expended annually for non-real estate subdivision development water main extensions.

7. List for each of the last 10 calendar years the total dollar amount of grants and loans that South Anderson District has received from federal and state sources for water main extensions.

8. Provide all studies and analyses that South Anderson District has prepared or commissioned that support its position that "the financial burden on the South Anderson Water District in making these reimbursements [refunds to real estate

subdivision developers for water main extensions] is extraordinary and openly burdens the customer of South Anderson Water District.”

9. Provide all studies and analyses that that South Anderson District has prepared or commissioned regarding the projected number of requests for water main extensions to real estate subdivision developments and the projected cost of such extensions.

10. State the average annual net revenue that a customer generates for South Anderson District.


Beth O'Donnell
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, Kentucky 40602

DATED: November 23, 2005

cc: Parties of Record